



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

989 18th STREET - SUITE 500
DENVER, COLORADO 80202-2488

FEB 27 1992

Ref: SHWM-FF

Mr. Frazer Lockhart
U.S. Department of Energy
Rocky Flats Office
Golden, CO 80402-0928Re: Technical Memorandum 1,
Revisions to Final Phase I
RFI/RI Work Plan for
Operable Unit 6

Dear Mr. Lockhart:

EPA has reviewed the above referenced document. The deficiencies which led to EPA's October 15, 1991, disapproval of the final Phase I RFI/RI Work Plan for Operable Unit 6 (OU 6) have been adequately addressed by this technical memorandum. However, our comments on the draft version of the work plan included concerns about DOE's identification of potential applicable or relevant and appropriate requirements (ARARS) for OU 6. We understood that these comments were being addressed in the context of the sitewide ARARS document. As this document has not yet been submitted by DOE, EPA as lead regulatory agency conditionally approves the Final Phase I RFI/RI Work Plan for OU 6, pending submittal and approval of the sitewide ARARS document. Enclosed is the Colorado Department of Health's (CDH) recommendation for approval.

By the terms of the Interagency Agreement, technical memoranda are intended to supplement approved documents. Since the final Work Plan for OU 6 was disapproved, it is inappropriate to supplement that document. Therefore, Technical Memorandum 1 for OU 6 must be rescinded by DOE and the contents incorporated into the final Phase I RFI/RI Work Plan for OU 6, resulting in one OU 6 document. We believe that in order for a document to be effectively implemented in the field, to the extent possible, it should be free of attachments which need to be cross referenced.

From the enclosed comments from CDH it appears that further consideration should be given to the appropriate surface soil sampling protocol. Since this has potential implications for all operable units at Rocky Flats, EPA encourages DOE to immediately begin discussions between DOE and its contractors, EPA, and CDH on this important topic.

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Our point of contact for OU 6 is Bonnie Lavelle,
(303)294-1067.

Sincerely,



Martin Hestmark, Manager
Rocky Flats Project

Enclosure

cc: Gary Baughman, CDH/HMWMD
Harlen Ainscough, CDH/HMWMD
Barbara Barry, CDH/RFPD
Robert Bick, DOE
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